

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,)	
)	
v.)	Crim. No. 04-10345-NMG
)	
MOHAMMED ABDUL RASHEED QURAISHI,)	
MOHAMMED ABDUL QAYIUM QURAISHI,)	
MOHAMMED ABDUL AZIZ QURAISHI,)	
)	
Defendants.)	

**ASSENTED-TO MOTION OF DEFENDANT AZIZ QURAISHI
TO RELEASE \$250,000.00 MORTGAGE BOND**

NOW COMES Defendant Mohammed Abdul Aziz Quraishi (“Aziz”) and hereby moves this Court to release the \$250,000 mortgage bond on the real property located at 38 Kevin Clancy Way, Stoughton, Massachusetts (the “Real Property”). In support of this motion, Aziz states as follows:

1. On November 18, 2004, Aziz was named in two counts of a five-count Indictment charging him with Encouraging and Inducing Aliens to Come to, Enter and Reside in the United States in violation of Law, in violation of 8 U.S.C. §1324(a)(1)(A)(iv) and 18 U.S.C. § 2 (Count 2) and Witness Tampering, in violation of 18 U.S.C. § 1512(b)(3) (Count 4). He was also charged in a Criminal Forfeiture allegation per 18 U.S.C. § 982(a)(6).
2. On December 2, 2004, Aziz entered into a mortgage agreement with the Clerk of the United States District Court for the District of Massachusetts in the amount of \$250,000 in favor of the United States of America (the “Mortgage Bond”) for purposes of securing Aziz’s conditions of release.

3. The Mortgage Bond was recorded at the Norfolk County Registry of Deeds on December 14, 2004 in Book 21882, Page 555.
4. On January 20, 2006, Aziz pled guilty to Counts 2 and 4 of the Indictment.
5. Aziz was sentenced in this matter on April 10, 2007. He is scheduled to report to his Bureau of Prisons designation on May 18, 2007.
6. As this matter has come to a conclusion, Aziz respectfully submits that the United States no longer needs the Mortgage Bond to secure Aziz's conditions of release.
7. The United States, through Assistant U.S. Attorney Alope Chakravarty, assents to the requested relief.

WHEREFORE, Defendant Mohammed Abdul Aziz Quraishi respectfully requests that this Court allow this motion, and, thereafter, release the \$250,000 Mortgage Bond on the Real Property located at 38 Kevin Clancy Way, Stoughton, Massachusetts.

Respectfully submitted,

COUNSEL FOR AZIZ QUARAISHI,

/s/ Laura B. Angelini

Michael J. Connolly (BBO # 638811)

Laura B. Angelini (BBO #658647)

Hinckley, Allen & Snyder LLP

28 State Street

Boston, MA 02109

(617) 345-9000

langelini@haslaw.com

ASSENTED TO:

/s/ Alope Chakravarty
Alope Chakravarty
Assistant U.S. Attorney
John Joseph Moakley Federal Courthouse
1 Courthouse Way
Boston, MA 02210
aloke.chakravarty@usdoj.gov

Dated: May 3, 2007

CERTIFICATE OF SERVICE

I hereby certify that on this 3rd day of May, 2007, this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants.

/s/ Laura B. Angelini